

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

CITY OF TACOMA, a municipal corporation,)
)
 Plaintiff,)
)
 v.)
)
 CLEAR CHANNEL OUTDOOR, INC., a)
 Delaware corporation,)
)
 Defendant.)

No.

DECLARATION OF OLIVIA LIPPENS IN
SUPPORT OF NOTICE OF REMOVAL

Olivia Lippens declares as follows:

1. I am the President and General Manager for Clear Channel Outdoor, Inc. I make these statements of my own personal knowledge.

2. Clear Channel Outdoor, Inc., is organized under the laws of Delaware and its principal place of business is in San Antonio, Texas.

3. In 2007, Clear Channel's signs in Tacoma were worth in excess of \$30,000,000. Since that time, the signs have increased in value.

4. The Clear Channel signs affected by Tacoma Substitute Ordinance 28009 have a collective value far in excess of \$75,000.

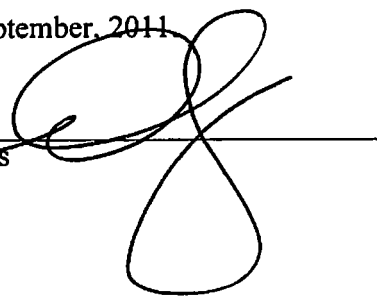
DECLARATION OF OLIVIA LIPPENS IN SUPPORT OF NOTICE
OF REMOVAL - 1

BYRNES • KELLER • CROMWELL LLP
38TH FLOOR
1000 SECOND AVENUE
SEATTLE, WASHINGTON 98104
(206) 622-2000

1 I declare under penalty of perjury under the laws of the state of Washington that this
2 declaration is true and correct.

3 DATED at Seattle, Washington, this 7th day of September, 2011

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5 Olivia Lippens
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A handwritten signature in black ink, consisting of a large, stylized 'O' followed by a series of loops and a horizontal line extending to the right, crossing over the signature.

DECLARATION OF OLIVIA LIPPENS IN SUPPORT OF NOTICE
OF REMOVAL - 2

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CERTIFICATE OF SERVICE

The undersigned attorney certifies that on the 16th day of September, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Shelley M. Kerslake
Kenyon Disend, PLLC
11 Front Street South
Issaquah, WA 98027-3820

/s/ Paul R. Taylor

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